

HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

VICTOR EPSTEIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

US FOODS, INC., an Illinois corporation,

Defendant.

Case No. 2:25-cv-00023-LK

**REQUEST FOR FRCP 41 VOLUNTARY
DISMISSAL WITHOUT PREJUDICE**

REQUEST FOR FRCP 41 VOLUNTARY
DISMISSAL WITHOUT PREJUDICE
CASE NO.: 2:25-cv-00023-LK

JUSTICE LAW CORPORATION
751 N. Fair Oaks Ave., Suite 101
Pasadena, California 91103
TEL. (818) 230-7502 • FAX (818) 230-7259
www.justicelawcorp.com

1 | Plaintiff Victor Epstein ("Plaintiff") hereby files this Request for Voluntary Dismissal
2 without Prejudice and [Proposed] Order of Dismissal pursuant to Federal Rule of Civil Procedure
3 41(a)(1)(A)(i). Defendant has not yet filed an Answer pleading. Plaintiff requests that this action
4 be dismissed without prejudice as to all claims, causes of action, and parties, with each party
5 bearing their own attorney's fees and costs.

6
7 Dated: September 3, 2025

8 **JUSTICE LAW CORPORATION**

9
10 By: s/ Dean Petitta

Douglas Han (WSBA No. 59429)

11 *dhan@justicelawcorp.com*

12 Shunt Tatavos-Gharajeh (WSBA No. 59424)

statavos@justicelawcorp.com

13 Dean Petitta (WSBA No. 58295)

dpetitta@justicelawcorp.com

14 751 North Fair Oaks Avenue, Suite 101

Pasadena, CA 91103

15 Telephone: +1 818 230-7502

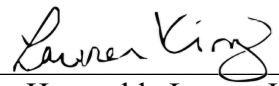
16 *Attorneys for Plaintiff Victor Epstein*
17
18
19
20
21
22
23
24
25
26
27
28

I. [PROPOSED] ORDER

Pursuant to Federal Rule of Civil Procedure 41, and upon Plaintiff Victor Epstein's request to voluntarily dismiss this action without prejudice, this Court hereby dismisses this case without prejudice.

IT IS SO ORDERED.

Date: September 3, 2025



The Honorable Lauren King
U.S. District Court Judge

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that, on the date stated below, I did the following:

On September 3, 2025, I transmitted a true copy of:

REQUEST FOR FRCP 41 VOLUNTARY DISMISSAL WITHOUT PREJUDICE

in the above-entitled matter to:

Alice Hoseterey

ahoesterey@orrick.com

kmantoan@orrick.com

ORRICK HERRINGTON & SUTCLIFFE

401 Union Street - Suite 3300

Seattle, WA 98101

[X] By ECF

[X] By Electronic Mail

Katie Briscoe

kbriscoe@orrick.com

ORRICK HERRINGTON & SUTCLIFFE

400 Capitol Mall, Suite 3000

Sacramento, CA 95814-4497

Joseph Liburt

jliburt@orrick.com

ORRICK HERRINGTON & SUTCLIFFE

1000 Marsh Road

Menlo Park, CA 94025-1015

Attorney(s) for US Foods, Inc.

Executed on September 3, 2025, at Pasadena, California.

/s/ Flor Gonzalez

Flor Gonzalez